



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

JAN 24 1990

MEMORANDUM:

Subject: Product Chemistry Review on Wood-Treat Technical Penta  
and Block Penta.  
EPA Registration Number: 10412-3 and 5382-16 respectively

From: Radamés Lozada, Chemist  
Product Chemistry Review Section  
Registration Support Branch  
Registration Division (H7505C)

To: Susan Lewis, PM 21  
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Registration Division (H7505C)

Thru: Lynn M. Bradley, Head  
Product Chemistry Review Section  
Registration Support Branch  
Registration Division (H7505C)

Note: Appendix D contains CBI for multiple companies  
and is not to be released.

Requestor: Idacon, Inc. and  
Vulcan Materials Company

EPA Registration Number: 10412-3 (Idacon)  
5382-16 (Vulcan)

EPA MRID No.: 410027-1, 410027-2, 410027-3, 410027-4 (Idacon)  
409994-1, 409994-2, 409994-3 (Vulcan)

Pesticide Chemical Code: 063001

Company Code No.: none

Chemical Name: 2,3,4,5,6-Pentachlorophenol

Common/Trade Name: Penta, PCP, Pentachlorophenol and 2,3,4,5,6-  
Pentachlorohydroxybenzene.

Use: Wood Preservatives

I. INTRODUCTION:

This submission proposes a 50/50 composite test material of Idacon Wood Treat Technical Penta and Vulcan Block Penta, instead of testing both separately, to fulfill the requirements of the Data Call In Notice.

This review uses the submitted data as well as data submitted under The Wood Preservatives Special Review Settlement to determine whether use of a mixture of the two products is acceptable as proposed.

II. BACKGROUND:

On August 4, 1988 the Environmental Protection Agency send a Notice for Comprehensive Data Call In (DCI) on Pentachlorophenol (PCP) to Vulcan Materials Company and Idacon, Inc. The Notice required them and any other registrants of pesticide products containing the active ingredient, PCP, to submit certain data (the description of the specific data required can be found in the Notice) in order to maintain the continued registration of their products.

The Penta Task Force (PTF) is a group composed of producers and formulators of PCP which has formed for the purpose of responding to the PCP Data Call-In issued by EPA.

According to the PTF, the product to be tested must be defined before the initiation of the studies required in the DCI. PTF proposes that the sample of PCP to be tested should be a combination of that produced by Vulcan and Idacon, in a 50/50 mixture.

III. Product Chemistry Data:

The percentage concentration and lot to lot variability of individual Vulcan and Idacon Penta constituents has been given by the companies.

See Appendices A and B for a disclosure of the product chemistry data on the Vulcan and Idacon produced material, respectively.



IV. Statistical Analyses:

A. PTF Statistical Analysis:

The registrant has submitted a statistical analysis of data sets produced by both companies. Analysis of these data was undertaken to determine if the two PCP samples, based on product chemistry, differ in any meaningful way. Each data set represents single analyses of several batches of penta.

Refer to Confidential Appendix C for a detailed discussion of this analysis, taken directly from the submission.

B. EPA Statistical Analysis:

Since February of 1987, in accordance with the final Settlement of the Wood Preservatives Special Review, Vulcan and Idacon have been sending to EPA monthly reports of analysis of production batches, that include data on the concentrations of several impurities of their products. This data was supplied to the reviewer by Charlie Cook, PMSD, who has been reviewing the data as they were submitted.

The purpose of this statistical analysis was to determine if the two products, based on product chemistry, differ in any meaningful way, and also to compare with the conclusion of the analysis made by PTF.

Refer to Confidential Appendix D for a detailed discussion of the statistical analysis made by the reviewer with these data.

V. Conclusion:

Both statistical analyses clearly show that Vulcan and Idacon Penta products are chemically different and can not be employed interchangeably for the testing required in the DCI.

Attachments:

Confidential Appendix A  
Confidential Appendix B  
Confidential Appendix C  
Confidential Appendix D

**Note to PM :** A Confidential Appendix D is attached. This Appendix contains information used to determine if significant differences exist in the content of the two compared products. This information contains CBI for multiple products and is not to be released.

**Pages 5-21 \*Manufacturing process information may be entitled to confidential treatment\***